

EXHIBIT L

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

UNIVERSAL LIFE CHURCH
MONASTERY STOREHOUSE, a
Washington non-profit corporation,

Plaintiff,

vs.

MAURICE KING, LEWIS KING, GLEN
YOSHIOKA, DYLAN WALL, SARA
WHITE, and AMERICAN MARRIAGE
MINISTRIES, a Washington non-profit
corporation,

Defendants.

No. 2:19-CV-00301-RSL

AMENDED
NOTICE OF DEPOSITION

TO: DEFENDANT AMERICAN MARRIAGE MINISTRIES

DATE: April 14-15, 2020 (as provided by AMM)

TIME: 9:00 am

PLACE: Remotely, via videoconference, as per the Court's Order (ECF No. 60)
of March 25, 2020.

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that pursuant to
Fed.R.Civ.Pro 30(b)(6) Plaintiff Universal Life Church Monastery Storehouse will take
the deposition upon oral examination of Defendant American Marriage Ministries through
its identified and designated agent(s), under oath administered by a Notary Public or such
person as authorized to administer oaths, with said testimony to given by video through

1 TSG Reporting and transcribed by court reporter, at the date, time, and place indicated
2 above, with said oral examination to be subject to continuance or adjournment from time
3 to time or place to place until completed.

4 For said deposition, Defendant American Marriage shall designate one or more
5 officers, directors, managing agents, or other persons who consent to testify on its behalf
6 as to the matters following designated matters:

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8 1. Your knowledge and awareness of Plaintiff, Plaintiff's status as a corporate
9 entity, and any relationship, affiliation, or lack thereof between Plaintiff and Universal Life
10 Church, Inc. or any other "Universal Life Church" entity based in California, including when
11 and how You obtained such knowledge or awareness.

12 2. The "preparing, reviewing, and approving [of] the content" of the AMM-v-
13 ULC website, including the identity of each individual involved and the nature of such
14 individual's involvement

15 3. The "preparing, reviewing, and approving [of] the content" of the AMM Legal
16 website, including the identity of each individual involved and the nature of such individual's
17 involvement.

18 4. The basis for Your statement "There are two major organizations when it
19 comes to online ordination, American Marriage Ministries (AMM) and the Universal Life
20 Church Monastery (ULC Monastery)," including any investigation conducted by You into
21 the veracity of this statement and any metric used to determine the existence of "two major
22 organizations."

23 5. The basis for Your statement "AMM and the ULC Monastery are the two most
24 established options," including any investigation conducted by You into the veracity of this
25 statement and any metric used to determine "the two most established options."
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1 **6.** The basis for Your statement “[s]ince AMM and the ULC Monastery are the
2 *two most established options*, we’ve created a side-by-side comparison to help,” including
3 which “side-by-side comparison” this statement refers to.

4 **7.** Any factual support or reason to believe that Plaintiff “had had [its] IRS non-
5 profit status revoked.”

6 **8.** Any factual support or reason to believe Plaintiff “has been embroiled in fraud
7 allegations.”

8 **9.** Any factual support or reason to believe Plaintiff “has been in and out of
9 bankruptcy.”

10 **10.** The bases for Your statement there are “dozens of rulings against the Universal
11 Life Church for tax fraud, denial of validity of ULC ordinations, and millions of dollars in
12 fines levied against the Universal Life Church.”

13 **11.** Any factual support or reason to believe there are “dozens of rulings against
14 [Plaintiff] for tax fraud, denial of Validity of [Plaintiff’s] ordinations, and millions of dollars
15 in fines levied against [Plaintiff],” including any investigation conducted by You into the
16 veracity of such claim.

17 **12.** The basis for Your statement “the Universal Life Church [has] hundreds of
18 offshoots.”

19 **13.** Any factual support or reason to believe Plaintiff has “hundreds of offshoots.”

20 **14.** The basis for Your statement “to the best of our knowledge the federal
21 government does not recognize the ULC Monastery as a 501c3 church,” including any
22 investigation conducted by You into the veracity of such claim.

23 **15.** The basis for Your statement “the federal government recognizes AMM as a
24 501(c)(3) tax exempt church.”

25 **16.** The basis for Your statement “American Marriage Ministries...is a Federally
26 Recognized 501c3 Charitable Organization.”
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1 **17.** The basis for Your statement AMM is an “IRS 501c3 Certified Non-Profit
2 Ministry.”

3 **18.** The basis for Your statement, “AMM is a federally recognized 501c(3)
4 charitable organization.”

5 **19.** The basis for Your statement, “The Universal Life Church (Monastery) has not
6 been approved by the Internal Revenue Service as a tax-exempt, charitable organization with
7 501c(3) recognition,” including any investigation conducted by You into the veracity of this
8 claim.

9 **20.** The basis for Your statement the AMM-v-ULC “website is run by ministers
10 that are affiliated with American Marriage Ministries.”

11 **21.** The basis for Your statement the AMM Legal Website “is run by ministers that
12 are affiliated with American Marriage Ministries.”

13 **22.** The factual support for Your statement “American Marriage Ministries has
14 worked with the Clark County Clerk’s Office for years, and AMM ministers perform
15 marriages in Las Vegas every day.”

16 **23.** The factual support for Your statement, “AMM appears” on “Clark County’s
17 official list of recognized churches.”

18 **24.** Your theological doctrine.

19 **25.** The dates of Your registration and control of the domain
20 “americanmarriageministries.com” and the manner in which You used the
21 americanmarriageministries.com, including any content published via such domain name.

22 **26.** Your past and present policies and procedures regarding management,
23 registration, and renewing registrations for domains You have registered or control.

24 **27.** When and how You first learned that someone other than You had owned,
25 controlled, or registered the domain “americanmarriageministries.com.”
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1 **28.** Any actions You undertook to determine or identify the registrant or operator of
2 the americanmarriageministries.com domain name or associated website, the dates of such
3 actions, the identity of all individuals involved in such actions, and the nature of such
4 individuals' involvement.

5 **29.** Any actions You undertook to monitor the content or use of the
6 americanmarriageministries.com domain name or associated website, the dates of such
7 actions, the identity of all individuals involved in such actions, and the nature of such
8 individuals' involvement.

9 **30.** Any actions You undertook to stop, deter, or obtain some remedy for the
10 actions underlying Your counterclaims against Plaintiff, the dates of such actions, the identity
11 of all individuals involved in such actions, and the nature of such individuals' involvement.

12 **31.** Your past and present decisions to, or not to, address or take action against any
13 of Plaintiff's alleged actions underlying Your claims against Plaintiff, the dates of such
14 decisions, the basis and rationale for such decisions, the identity of all individuals involved in
15 such decisions, and the nature of such individuals' involvement.

16 **32.** When and how You first learned any facts to support Your contention that on or
17 about May 22, 2013, the americanmarriageministries.com website redirected visitors to one
18 of Plaintiff's websites, specifically, <https://www.themonastery.org>.

19 **33.** When and how You first learned any facts to support Your contention that on or
20 about May 17, 2014, the website at americanmarriageministries.com stated "Welcome to the
21 American Marriage Ministries, a proud affiliate of the Universal Life Church."

22 **34.** When and how You first learned any facts to support Your contention that on
23 November 17, 2014, the website at "americanmarriageministries.com" stated "Legally
24 Invalid American Marriage Ministries Ordination," and "This webpage exists to inform
25 would-be ministers that ordinations performed by the American Marriage Ministries...are
26 NOT considered legally valid."
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1 **35.** When and how You first learned any facts to support Your contention that on
2 November 26, 2018, and for at least the two years prior, the website at
3 “americanmarriageministries.com” stated “American Marriage Ministries ordinations...may
4 not enable would-be ministers to perform legally recognized marriages.”

5 **36.** The basis and support for Your contention “AMERICAN MARRIAGE
6 MINISTRIES has come to be associated with the services provided by AMM,” including
7 Your claim of acquired distinctiveness under Section 2(f) of the Lanham Act and any
8 evidence related to such distinctiveness.

9 **37.** Your application to federally register the words “AMERICAN MARRIAGE
10 MINISTRIES” as a trademark, including all filings and statements communicated to the U.S.
11 Patent & Trademark Office in support thereof.

12 **38.** Your disclaimer of any exclusive rights to the words “marriage ministries”
13 apart from the claimed trademark “AMERICAN MARRIAGE MINISTRIES.”

14 **39.** Your knowledge of the “memorandum order issued by Senior Judge Curtis E.
15 von Kann of the D.C. Superior Court dated May 25, 2012” and Your contention the
16 “memorandum order” is “now moot.”

17 **40.** The bases for Your denial of Requests for Admission 16 through 19.

18 **41.** The basis for Your contention “AMM ministers are authorized to perform
19 marriages in all 50 states,” including any investigation by You regarding the veracity of this
20 contention.

21 **42.** The damages You are seeking, including the components thereof and how each
22 component was calculated or derived.

23 **43.** The facts and support for Your statement You “have been injured
24 reputationally,” by Plaintiff’s alleged actions as well as how You ascertained and measured
25 such injury.
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1 **44.** All “lost business” You contend You lost as a result of Plaintiff’s alleged
2 actions, as well as how You ascertained and measured such lost business.

3 **45.** Your policies, practices, and procedures as to the creating and maintaining
4 accounting and financial records, and what records and documents are created and
5 maintained.

6 **46.** The support and basis for Your contention that “prospective customers may be
7 dissuaded by [Plaintiff’s] statement about AMM...from using AMM’s services,” Including
8 any investigation by You into the veracity of such contention.

9 **47.** Your past and present policies, procedures, practices, and abilities to track or
10 identify the visitors to Your websites, including the number of such visitors, the sources and
11 channels through which such visitors visited Your websites, and the activity of such visitors
12 on Your websites, and including the identity of each individual involved in such tracking and
13 identification and the nature of such individual’s involvement

14 **48.** Your past and present policies, procedures, practices, and abilities to track or
15 identify the number of ministers or officiants ordained by You, including the identity of each
16 individual involved in such tracking and identification and the nature of such individual’s
17 involvement.

18 **49.** Any evaluations, studies, surveys, or analyses You performed, or which You
19 are aware of, as to whether any individual was, or could have been or could be, deceived,
20 confused, or misled by any statement You attribute to ULC Monastery.

21 **50.** All efforts by AMM Directors and personnel after July 3, 2019 to locate and
22 identify documents potentially responsive to Plaintiff’s First Interrogatories and Requests for
23 Production.

24 **51.** Any terms, words, or phrases used or understood by Your or the general public
25 to refer to AMM.
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Definitions:

A. The term "You" or "Your" as used herein refers to Defendant American Marriage Ministries responding to these requests, including all of its agencies and sub-agencies, departments and sub-departments, employees, agents, servants, accountants, officers, directors, principals, and partners (whether general, limited, or otherwise).

B. "The AMM-vs-ULC Website" means and refers to the website with the domain <https://amm-vs-ulc.com>.


C. "The AMM Legal Website" means and refers to the website with the domain <https://americanmarriageministrieslegal.com>.

D. "AMERICAN MARRIAGE MINISTRIES Mark" means and refers to the term "AMERICAN MARRIAGE MINISTRIES" in standard characters, as set forth in the U.S. Trademark Registration 4,887,624.

DATED this 9th day of April 2020.

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